Koch, Kristine

From: Koch, Kristine

Sent: Monday, August 18, 2014 8:16 AM

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Subject: FW: Portland Harbor RI Section 5

All – here is the latest on Section 5 issues that we are working to resolve.

Regards,

Kristine Koch Remedial Project Manager USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency Region 10 1200 Sixth Avenue, Suite 900, M/S ECL-115 Seattle, Washington 98101-3140

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From: Jennifer Woronets [mailto:jworonets@anchorgea.com]

Sent: Friday, August 15, 2014 5:17 PM

To: Koch, Kristine

Cc: Jennifer Woronets; Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas; sandy browning

(sbrowning@integral-corp.com); Bob Wyatt; Patty Dost

Subject: FW: Portland Harbor RI Section 5

Kristine,

Please see below from Jim.

Let us know if you have any questions.

Thank you, Jen Woronets ☺ Anchor QEA, LLC jworonets@anchorqea.com 421 SW Sixth Avenue, Suite 750 Portland, OR 97204

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From: James McKenna [mailto:jim.mckenna@verdantllc.com]

Sent: Friday, August 15, 2014 4:05 PM

To: Jennifer Woronets

Cc: Laura Jones (ljones@integral-corp.com); Gene Revelas (grevelas@integral-corp.com); Bob Wyatt; Patty Dost

Subject: RE: Portland Harbor RI Section 5

Kristine,

Integral has completed a review of your revised RLSO of RI Section 5. Your edits were aimed at reflecting the changes we discussed during our recent informal technical meetings. Based on Integral's review, we note the following:

Section 5.0:

1) No issues.

Section 5.1 (Selection of Indicator Contaminants):

1) Outstanding issue for BERA screen on TCDD TEQ and monobutyltin. All others resolved.

Section 5.2 (Bedded Sediment):

1) 5.2.12.2 – Downtown Reach. Add "mean" to the sentence, "Concentrations ranging from 0.4 J to 1,990 μg/kg, with a mean concentration of 74.6 μg/kg (Table 5.2-15a)."

Section 5.3 (Sediment Traps):

- 1) 5.3.1 Change RM "11.5" to RM "11.8"
- 2) 5.3.4.1 Last paragraph add "suspended sediment" to the sentence, "This observation suggests more influence of the localized elevated <u>suspended sediment</u> levels on the material being deposited in the traps during low flows."
- 3) 5.3.6.1 Last sentence of last paragraph Make the following revisions for accuracy, "The elevated detection limits could obscure low concentrations of DDx. In addition, 9 36.5 percent of the results were qualified as tentatively identified and estimated (NJ) during data validation due to poor confirmation, and another 15 49.2 percent were estimated (J) as a result of the confirmation data."

Section 5.4 (Surface Water):

- 1) Clarification needed in Section 5.4.8.1 EPA added a note to retain some text (a discussion of MCLs), but may have accepted the accompanying deletion by accident.
- 2) Outstanding issue for retaining the screening discussions against MCL values.

Section 5.5 (TZW):

- 1) Clarification needed in Section 5.5.1.1 Text and footnotes on page 5.5-3: Need to clarify that EPA agrees that this text and footnotes 3, 4 and 5 are to be retained where currently placed in the text. Based on the 8/1/14 it was our understanding this text and footnotes should be retained here and the strikeout should be removed. (*The strikeout is what is confusing us.*)
 - i. Text to retain: Two general types of sampling techniques were used to collect the TZW samples: diffusion samplers (small-volume peepers) and push probe samplers (Trident and Geoprobe tools were used as push probe samplers). These are described in detail in the Pilot Study FSP (Integral 2004a). All peeper samples were collected over the depth interval of 0 to 38 cm bml. Trident samples were collected at 30 cm bml, with a few deeper samples collected between 90 and 150 cm bml.[1] Geoprobe

samples were collected at depths ranging from 30 to 6,300 cm bml, though only Geoprobe samples from 0 to 90 cm bml are presented in this discussion of TZW nature and extent.

- ii. Footnotes to retain:
 - (3) One Trident sample was collected at 60 cm bml at location CP-07-B. This sample is included with the 90 to 150 cm bml data set.
 - (4) Geoprobe data collected at 91 cm bml was collected for naphthalene and is included in Appendix D.
 - (5) For the Gasco study (sample IDs that begin with "GS-"), the sample collected at the uppermost depth in the 0 to 90 cm bml interval at each location is presented on maps to represent the TZW concentrations in the shallow layer. No deeper data collected as part of the Gasco study is presented. Only one sample (GS-C2, 73 to 103 cm bml) in the 2007 Gasco Investigation was collected in the deeper (90 to 150 cm bml) sample interval; this sample is not included in this nature and extent discussion. For the Siltronic study (sample IDs that begin with "GP-"), samples collected at 31 cm bml are presented as shallow TZW.

Section 5.6 (Biota):

1) At this time we do have any further questions regarding EPA's few editorial revisions as well as EPA's comment to revise Section 5.6.3.1.2 sentence, "Twenty-five whole body composite samples of sculpin were collected and submitted to the laboratory for dioxin/furan toxic equivalent analysis".

It is our recommendation that we convene a short phone call early next week to discuss just a few of these issues (e.g., Section 5.1 re BERA screen of TCDD TEQ and monobutyltin; Section 5.4 re clarify deleted text about screening MCLs; and Section 5.5 re clarify retaining text and footnotes 3, 4 and 5). I think 30 minutes would suffice. We are hopefully all the other suggested changes listed above are acceptable to you and we do not need to discuss them (please confirm).

Let me know if you want Jen to get a conference call arranged early next week so we can resolve these issues.

Thanks,

Jim McKenna Verdant Solutions, LLC 5111 SE 41st Avenue Portland, Oregon 97202 Office: (503) 477-5593 Cell: (503) 309-1621

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From: Koch, Kristine [mailto:Koch.Kristine@epa.gov]

Sent: Monday, August 11, 2014 2:24 PM

To: Bob Wyatt (rjw@nwnatural.com); James McKenna

Cc: Jennifer Woronets; Sheldrake, Sean **Subject:** Portland Harbor RI Section 5

Bob and Jim – I have reviewed all the edits LWG has proposed to the modifications EPA made to this section. While I haven't removed all the redline/strikeout text, I'm approving the edits as they currently exist in this version. We have discussed and agreed to language in Sections 5.0 through 5.5. I have agreed to the majority of the edits made to Section 5.6, with a few noted exceptions redlined in the document. Please look over the attached documents and see if you are in agreement with the current version. Let me know if we need to discuss further.

Regards,

Kristine Koch Remedial Project Manager USEPA, Office of Environmental Cleanup

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